

Judge Hellerstein

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

LAURA FRIZZELL,

Defendant.

INDICTMENT

07 Cr. 512

COUNT ONE

The Grand Jury charges:

1. From in or about 2006, up to and including on or about March 8, 2007, in the Southern District of New York and elsewhere, LAURA FRIZZELL, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that LAURA FRIZZELL, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about March 8, 2007, LAURA FRIZZELL, the defendant, and a co-conspirator not named as a defendant herein, drove to the Bronx, New York to pick up approximately 3 kilograms of heroin.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS AS TO COUNT ONE

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, LAURA FRIZZELL, the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to proceeds obtained as a result of the offense described in Count One of this Indictment.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;


c. has been placed beyond the jurisdiction of the Court;

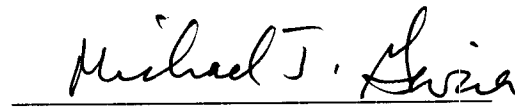
d. has been substantially diminished in value;  
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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LAURA FRIZZELL,

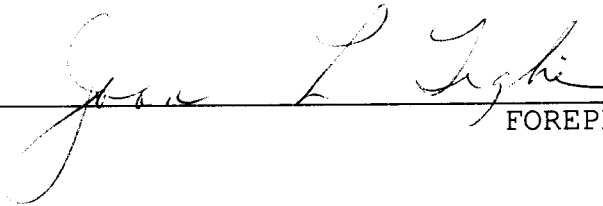
Defendant.

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INDICTMENT

07 Cr. \_\_

(Title 21, United States Code,  
Section 846.)



FOREPERSON

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MICHAEL J. GARCIA

United States Attorney.

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HR 6/7/07 Indictment filed. Case assigned to  
Judge Hellerstein.

Francis, J.